

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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**DENNIS BALL-BEY**

Plaintiff,

v.

**KYLE CHANDLER,  
RONALD VAUGHN,  
FORMER POLICE CHIEF SAM  
DOTSON, and  
CITY OF ST. LOUIS et al.,**  
Defendants.

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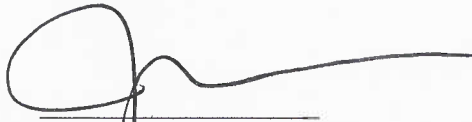
Case No. :18-CV-01364

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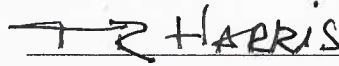
**AFFIDAVIT IN SUPPORT OF ATTORNEY'S FEE**

1. I submit this affidavit in support of the Court Order for attorney's fees pursuant to Rule 37(a)(5). (See ECF 244)
2. The customary fee for attorneys in the area of personal injury is 33 1/3% before a lawsuit is filed and 40% after a lawsuit is filed.
3. Likewise, Counsel's has a similar contingency contract for services in this matter.
4. Additionally, Counsel's contract provides for a \$400.00 hourly rate for services.
5. Based on my 16 years of experience, a reasonable hourly fee is \$350.00-\$500.00 per hour.
6. In preparation for Plaintiff's two motions to compel in this matter, Counsel expended 1.3 hours of time collectively on the motions.
7. Additionally, Counsel's travel to and from this Court's hearing on said Motions, including court time was an additional hour.
8. I am requesting the Court approve an attorney fee in the amount of \$800.00.

9. The attorney fee is fair and reasonable.

  
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Jermaine Wooten

Subscribed and sworn to before me on this 6<sup>TH</sup> day of APRIL, 2023.

  
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NOTARY PUBLIC

MY COMMISSION EXPIRES:

